Federal Operating Permit
Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1, of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	International Paper
Facility Name:	Shorewood Packaging Corporation of Virginia
Facility Location:	815 Chapman Way Newport News, Virginia
Registration Number:	60913
Permit Number:	TRO-60913

This permit includes the following programs:

Federally Enforceable Requirements - Clean Air Act (Sections I through IX)
State Only Enforceable Requirements (Section XI)

November 14, 2007
Effective Date

November 13, 2012
Expiration Date

_____
Francis L. Daniel

November 14, 2007
Signature Date

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FACILITY INFORMATION

Permittee
International Paper
6420 Polar Avenue 5-019
Memphis, TN 38197

Responsible Official
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General Manager, Shorewood Packaging in Newport News

Facility
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815 Chapman Way
Newport News, VA, 23608

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County-Plant Identification Number: 51-700-00066

Facility Description: NAICS 32311 – The facility is a commercial printing operation using three centers of packaging rotogravure and lithographic presses to manufacture folding cartons.
Production Center: the two packaging rotogravure presses, using a total enclosure that is connected to the Production Center catalytic incinerator for VOC/HAP control.
Technical Center: the one packaging rotogravure press, which includes a coating station, that uses a total enclosure connected to the Technical Center catalytic incinerator for VOC/HAP control.
Lithographic Center: the three non-heatset sheetfed offset lithographic presses that use conventional inks, UV inks, and water based coatings and one coater that uses water-based and UV coatings.

I. Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Production Center							
RGP-1	1a & 1b	Packaging rotogravure press, Bobst Champlain, Model M873. 2003	Ten Rotogravure stations, web width of 44 inches, and rated at 600 ft/hr, with electron beam drying option.	Catalytic incinerator, Grace TEC Systems, Model Mangnum Quantum 41000. 1995	CI-1	VOC/HAPS	07/10/07
RGP-3	1a & 1b	Packaging rotogravure press, Bobst Champlain, Model M873 with electron beam curing option. 1982	Nine stations, web width of 44 inches, and rated at 600 ft/hr, with electron beam drying option.	Catalytic incinerator, Grace TEC Systems, Model Mangnum Quantum 41000. 1995	CI-1	VOC/HAPS	07/10/07
Technical Center							
RGP-4	2	Packaging rotogravure press, Chambon, Model 176-597. 1994	Eight stations, web width of 13.5 inches, and rated at 550 ft/hr.	Catalytic incinerator, M & W Industries. 1994	CI-2	VOC/HAPS	07/10/07
Lithographic Center							
LP-1	N/A	Lithographic press, KBA 130 Planeta. 2002	Non-heatset sheetfed offset lithographic press consisting of eight print units and two coating unit**s**, a sheet width of 51 inches and rated at 15,000 sheets/hr. Can use UV inks.	N/A			07/10/07
LP-2	N/A	Lithographic press, KBA Planeta Rapida, Model RA 130A-7 + LALW. 1997	Non-heatset sheetfed offset lithographic press consisting of seven print units and one coating unit, a sheet width of 51 inches and rated at 15,000 sheets/hr.	N/A			07/10/07
LP-3	N/A	Lithographic press, KBA Planeta Rapida, Model RA 130-7 + L-ALV. 1998	Non-heatset sheetfed offset lithographic press consisting of seven print units and one coating unit, a sheet width of 51 inches and rated at 15,000 sheets/hr. Can use UV inks.	N/A			07/10/07

*The Size/Rated capacity and PCD efficiency is provided for informational purposes only, and is not an applicable requirement.

II. Process Equipment Requirements – (RGP-1, RGP-3, and RGP-4), NSR permit of 7/10/2007

A. Limitations

1. Volatile Organic Compound (VOC) emissions from the rotogravure presses (RGP-1 and RGP-3) shall be controlled by a total enclosure capture system and a catalytic incinerator (CI-1) having at least 95% destruction efficiency. The catalytic incinerator shall be provided with adequate access for inspection and shall be in operation when the rotogravure presses are operating.

   (9 VAC 5-80-110 and Condition 3 of NSR permit dated 07/10/2007)

2. Each chamber of the catalytic incinerator (CI-1) for the production center shall maintain a minimum inlet temperature of 550 °F (clock hourly average) and a retention time of 0.34 seconds. Each chamber of the catalytic incinerator shall be equipped with devices to continuously measure temperature before and after the catalyst bed and the pressure drop across the catalyst bed. The maximum outlet temperature from each chamber of the catalytic incinerator shall not exceed 1200 °F (clock hourly average). The permittee shall maintain records of the manufacturer's recommendations for catalyst bed replacement and records of actual catalyst bed replacement.

   (9 VAC 5-80-110 and Condition 5 of NSR permit dated 07/10/2007)

3. Volatile organic compound (VOC) emissions RGP-4 in the tech center shall be controlled by a total enclosure efficient capture system and a catalytic incinerator (CI-2) having at least 95% destruction efficiency. The catalytic incinerator shall be provided with adequate access for inspection.

   (9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 4 of NSR permit dated 07/10/2007)

4. The catalytic incinerator (CI-2) for the tech center shall maintain a minimum inlet temperature of 550 °F (clock hourly average) and a retention time of 0.20 seconds. The catalytic incinerator shall be equipped with devices to continuously measure temperature before and after the catalyst bed and the pressure drop across the catalyst bed. The maximum outlet temperature from the catalyst bed shall not exceed 1200 °F (clock hourly average). The permittee shall maintain records of the manufacturer's recommendations for catalyst bed replacement and records of actual catalyst bed replacement.

   (9 VAC 5-80-110, and Condition 6 of NSR permit dated 07/10/2007)

5. Each total enclosure shall meet the following criteria:
   a. Any natural draft openings shall be at least 4 equivalent opening diameters from each VOC emitting point;
   b. The total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
   c. The average facial velocity of air through the natural draft openings shall be at least 200 feet per minute and the direction of flow shall be into the enclosure.

d. All access doors and windows shall be closed during routine operation of the presses or coaters.

(9 VAC 5-80-110, Section 6 of Method 204 of 40 CFR 51 Appendix M, and Condition 7 of NSR permit dated 07/10/2007)

6. All the dampers in the duct work in the Production Center and Tech Center which could cause any fugitive VOCs to escape to the atmosphere shall be kept closed at all times except in case of a fire hazard.

   (9 VAC 5-80-110, and Condition 8 of NSR permit dated 07/10/2007)

7. The combined VOC throughput of materials to the two packaging rotogravure press units of RGP-1 and RGP-3 from the usage of inks, coatings, thinners, and cleaners (combined) shall generate no more than 1608.5 tons of VOCs per year, calculated monthly as the sum of each consecutive 12-month period.

   (9 VAC 5-80-110, and Condition 12 of NSR permit dated 07/10/2007)

8. The throughput of materials to RGP-4 in the tech center from the usage of inks, coatings, thinners, cleaners shall generate no more than 144.0 tons of VOCs per year, calculated monthly as the sum of each consecutive 12-month period.

   (9 VAC 5-80-110, and Condition 13 of NSR permit dated 07/10/2007)

9. Visible emissions from each of the catalytic incinerator stacks shall not exceed five (5) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).

   (9 VAC 5-80-110, and Condition 22 of NSR permit dated 07/10/2007)

10. Facility or Control Equipment Malfunction - Hazardous Air Pollutant Processes: The processes listed below shall, upon request of the Department, shut down immediately if its emissions increase in any amount because of a bypass, malfunction, shutdown or failure of the process or its associated air pollution control equipment. The processes shall not return to operation until it and the associated air pollution control equipment are able to operate in the proper manner.

    a. Gravure Presses 1and 3 in the Production Center,

    b. Gravure Press in the Technical Center.

    (9 VAC 5-80-110, and Condition 30 of NSR permit dated 07/10/2007)

11. Emissions from the operation of the rotogravure presses RGP-1 and RGP-3 (combined) shall not exceed the limits specified below:

Volatile Organic Compounds	80.4 tons/yr

    These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers A.1 and A.7.
    (9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 19 of NSR permit dated 07/10/2007)

12. Emissions from the operation of the RGP-4 in the tech center shall not exceed the limits specified below:

Volatile Organic Compounds	7.2 tons/yr

13. These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers A.3 and A.8.
(9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 20 of NSR permit dated 07/10/2007)

B. Monitoring

1. **Catalytic incinerator for Production Center:** Each chamber of the catalytic incinerator (CI-1) shall be equipped with a device to continuously measure and record the inlet and outlet temperature to and from the catalyst bed. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times the catalytic incinerator is operating. Any 1-hour average inlet temperature below 550 ºF shall be noted as an excursion. Any 1-hour average outlet temperatures above 1200 ºF shall be noted as an excursion. All noted excursions shall require immediate maintenance on the catalytic incinerator to return the inlet and/or outlet temperature to within its normal range of readings. All 1-hour average temperature excursions shall be considered a permit violation.
(9 VAC 5-80-110)

2. **Catalytic incinerator for Technical Center:** Each chamber of the catalytic incinerator (CI-2) shall be equipped with a device to continuously measure and record the inlet and outlet temperature to and from the catalyst bed. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times the catalytic incinerator is operating. Any 1-hour average inlet temperature below 550 ºF shall be noted as an excursion. Any 1-hour average outlet temperature above 1200 ºF shall be noted as an excursion. All noted temperature excursions shall require immediate maintenance on the catalytic incinerator to return the inlet and/or outlet temperature to within its normal range of readings. All 1-hour average temperature excursions shall be considered as a permit violation.
(9 VAC 5-80-110)

3. **Compliance Assurance Monitoring (CAM) -** The permittee shall monitor, operate, calibrate and maintain the thermal oxidizers for the catalytic converter (CI-1) controlling the rotogravure presses (RGP-1 and RGP-3) according to the following:

Monitoring, Frequency, Records	Performance Criteria	Indicator Range; Averaging Period
1. The chamber temperature is measured with a thermocouple and programmable logic controller. 2. Measured continuously. 3. Annual inspection of the primary heat exchangers and associated inlet/outlet valves and airflow dampeners. Monthy inspections of the capture enclosures.	A minimum of two (2) thermocouples located in each chamber. One to measure inlet temperature and one to measure outlet temperature.	1. The set point indicator is temperature readings from 550 ºF to 1200 ºF; excursions trigger a fault alarm and corrective action. 2. An excursion is defined as any 1-hour average inlet temperature below 550 ºF and/or any 1-hour average outlet temperature. 3. Non-compliance is defined as failure to perform inspections.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.6 (c))

4. **Compliance Assurance Monitoring (CAM) -** The permittee shall conduct the monitoring and fulfill the other obligations specified in 40 CFR 64.7 through 40 CFR 64.9.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.6 (c))

5. **Compliance Assurance Monitoring (CAM) -** At all times, the permittee shall maintain the monitoring equipment, including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7 (b))

6. **Compliance Assurance Monitoring (CAM) -** Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities, the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the thermal oxidizers are operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of compliance assurance monitoring, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by inadequate maintenance or improper operation are not malfunctions.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7 (c))

7. **Compliance Assurance Monitoring (CAM) -** Upon detecting an excursion or exceedance, the permittee shall restore operation of the thermal oxidizers (including the control device and associated capture system) to their normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup and shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator, designated condition, or below the applicable emission limitation or standard, as applicable.

   (9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7 (d)(1))

8. **Compliance Assurance Monitoring (CAM) -** Determination that acceptable procedures were used in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

   (9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7(d)(2))

9. **Compliance Assurance Monitoring (CAM) -** If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Director, Tidewater Regional Office and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

   (9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7(e))

10. **Compliance Assurance Monitoring (CAM) -** If the number of exceedances or excursions exceeds 5 percent duration of the operating time for each thermal oxidizer for a semiannual reporting period, the permittee shall develop, implement and maintain a Quality Improvement Plan (QIP) in accordance with 40 CFR 64.8. If a QIP is required, the permittee shall have it available for inspection. The QIP initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the permittee shall modify the plan to include procedures for conducting one or more of the following, as appropriate:

    a. Improved preventative maintenance practices;

    b. Process operation changes;

c. Appropriate improvements to control methods;

d. Other steps appropriate to correct control performance; and

e. More frequent or improved monitoring.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.8(a) and (b))

11. **Compliance Assurance Monitoring (CAM) -** The permittee shall monitor, operate, calibrate and maintain the thermal oxidizers for the catalytic converter (CI-2) controlling the rotogravure press (RGP-4) according to the following:

Monitoring, Frequency, Records	**Performance Criteria**	**Indicator Range; Averaging Period**
1. The chamber temperature is measured with a thermocouple and programmable logic controller. 2. Measured continuously. 3. Annual inspection of the primary heat exchangers and associated inlet/outlet valves and airflow dampeners. Monthy inspections of the capture enclosures.	A minimum of two (2) thermocouples located in each chamber One to measure inlet temperature and one to measure outlet temperature.	1. The set point indicator is temperature readings from 550 ºF to 1200 ºF; excursions trigger a fault alarm and corrective action. 2. An excursion is defined as any 1-hour average inlet temperature below 550 ºF and/or any 1-hour average outlet temperature. 3. Non-compliance is defined as failure to perform inspections.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.6 (c))

12. **Compliance Assurance Monitoring (CAM) -** The permittee shall conduct the monitoring and fulfill the other obligations specified in 40 CFR 64.7 through 40 CFR 64.9.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.6 (c))

13. **Compliance Assurance Monitoring (CAM) -** At all times, the permittee shall maintain the monitoring equipment, including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7 (b))

14. **Compliance Assurance Monitoring (CAM) -** Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the thermal oxidizers are operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of compliance assurance monitoring, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by inadequate maintenance or improper operation are not malfunctions.

    (9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7 (c))

15. **Compliance Assurance Monitoring (CAM) -** Upon detecting an excursion or exceedance, the permittee shall restore operation of the thermal oxidizers (including the control device and associated capture system) to their normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup and shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator, designated condition, or below the applicable emission limitation or standard, as applicable.

    (9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7 (d)(1))

16. **Compliance Assurance Monitoring (CAM) -** Determination that acceptable procedures were used in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

    (9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7(d)(2))

17. **Compliance Assurance Monitoring (CAM) -** If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Director, Tidewater Regional Office and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

    (9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7(e))

18. **Compliance Assurance Monitoring (CAM) -** If the number of exceedances or excursions exceeds 5 percent duration of the operating time for each thermal oxidizer for a semiannual reporting period, the permittee shall develop, implement and maintain a Quality Improvement Plan (QIP) in accordance with 40 CFR 64.8. If a QIP is required, the permittee shall have it available for inspection. The QIP initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the permittee shall modify the plan to include procedures for conducting one or more of the following, as appropriate:

    a. Improved preventative maintenance practices;

    b. Process operation changes;

    c. Appropriate improvements to control methods;

    d. Other steps appropriate to correct control performance; and

    e. More frequent or improved monitoring.

    (9 VAC 5-80-110 E (Article 1) and 40 CFR 64.8(a) and (b))

19. **Monitoring RGP-1 and RGP-3 emissions:** From a material balance of all products used by the two packaging rotogravure presses (RGP-1 and RGP-3) and Material Safety Data Sheet (MSDS) for the products, the permittee shall calculate the monthly and annual throughput of VOC materials and the VOC emissions, except as required by Conditions II.B.19.a, to demonstrate compliance with Conditions II.A.7 and 11. If VOC content is given as a range, the maximum value shall be used. The annual emissions are the sum of each consecutive 12-month period.

a. If any monthly monitoring (as required in Condition II.B.19) indicates that VOC emissions for RGP-1 and RGP-3 (combined) are equal to or greater than 50% of the allowable limit in Condition II.A.11, the VOC content of each VOC material used shall be determined the next calendar quarter using Reference Method 24 or 24A (40 CFR 60, Appendix A), and such determined VOC content shall be used for the purpose of calculating throughput and emissions. VOC content testing shall be conducted by the permittee or the supplier may provide a manufacturer's certificate of VOC content of the batch as supplied for each formulation of material received after such emissions threshold has been achieved. Each VOC material shipment received shall be clearly identified by a product formulation number which may be correlated to Method 24 or 24A test results. The most recent test results of VOC content for each formulation shall be used in emission calculations. Quarterly testing may be discontinued after actual VOC emissions are below 50% of the allowable limit in Condition II.A.11 for three consecutive months. If quarterly testing is discontinued, the VOC content determined in the latest test or manufacturer's certificate for each formulation may be used in lieu of the MSDS value in throughput and emission calculations.
(9 VAC 5-80-110)

20. **Monitoring RGP-4:** From a material balance of all products used by the rotogravure (RGP-4) in the Technical Center and Material Safety Data Sheet (MSDS) for the products, the permittee shall calculate the monthly and annual throughput of VOC materials and the VOC emissions, except as required by Conditions II.B.20.a, to demonstrate compliance with Conditions II.A.8 and 12. If VOC content is given as a range, the maximum value shall be used. The annual emissions are the sum of each consecutive 12-month period.

    a. If any monthly monitoring (as required in Condition II.B.20) indicates that VOC emissions for RGP-4 are equal to or greater than 50% of the allowable limit in Condition II.A.12, the VOC content of each VOC material used shall be determined the next calendar quarter using Reference Method 24 or 24A (40 CFR 60, Appendix A) and such determined VOC content shall be used for the purpose of calculating throughput and emissions. VOC content testing shall be conducted by the permittee or the supplier may provide a manufacturer's certificate of VOC content of the batch as supplied for each formulation of material received after such emissions threshold has been achieved. Each VOC material shipment received shall be clearly identified by a product formulation number which may be correlated to Method 24 or 24A test results. The most recent test results of VOC content for each formulation shall be used in the emission calculations. Quarterly testing may be discontinued after actual coating VOC emissions are below 50% of the allowable limit in Condition II.A.12 for three consecutive months. If quarterly testing is discontinued, the VOC content determined in the latest test or manufacturer's certificate for each formulation may be used in lieu of the MSDS value in throughput and emission calculations.
    (9 VAC 5-80-110)

21. **Monitoring Total Enclosures:** On a monthly basis, the permittee shall inspect each permanent total enclosure for the three packaging rotogravure presses (RGP-1, RGP-3, and RGP-4) and note any changes that have been made since the last permanent total enclosure certification was conducted.
(9 VAC 5-80-110)

C. Recordkeeping

1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. These records shall include, but are not limited to:
   a. The yearly throughput of materials and generated VOCs (from the inks, coatings, thinners, cleaners) for the three packaging rotogravure presses (RGP-1 and RGP-3) combined, calculated monthly as the sum of each consecutive 12-month period;
   b. The yearly throughput of materials and generated VOCs (from the inks, coatings, thinners, cleaners) for the 13.5 inch packaging rotogravure press (RGP-4) in the tech center, calculated monthly as the sum of each consecutive 12-month period;
   c. Records of inlet and outlet clock hourly average temperatures for the catalytic incinerators;
   d. Records of the manufacturers recommendations for catalyst bed replacement;
   e. Results from the monthly permanent total enclosure inspections;
   f. Material Safety Data Sheets for materials used by the gravure and litho presses that display the VOC by weight for all the materials used in the presses;
   g. The yearly VOC emissions for RGP-1 and 3 and RGP-4, calculated monthly as the sum of each consecutive 12-month period. The hourly VOC emissions for RGP-4 can be calculated from the monthly emissions and the hours of operation each month.

   These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

   (9 VAC 5-50-50, 9 VAC 5-80-110 and Condition 24 of NSR permit dated 07/10/2007)

2. **Compliance Assurance Monitoring (CAM) Recordkeeping -** The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan (QIP) required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan (QIP), and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).
   (9 VAC 5-80-110 E and 40 CFR 64.9(b))

D. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.

   (9 VAC 5-50-30 and 9 VAC 5-80-110)

2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ.

   (9 VAC 5-80-110)

E. Reporting

1. **Compliance Assurance Monitoring (CAM) Reporting** - the permittee shall submit CAM reports as part of the Title V semi-annual monitoring reports required by Condition X.C.3 of this permit to the Director, Tidewater Regional Office. Such reports shall include at a minimum:

   a. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

   b. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

   c. A description of the actions taken to implement a quality improvement plan (QIP) during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

   (9 VAC 5-80-110 F and 40 CFR 64.9(a))

III. Process Equipment Requirements – (LP 1-3), NSR permit of 07/10/2007

A. Limitations

1. Volatile organic compound (VOC) emissions from the three non-heatset sheetfed offset lithographic presses (LP 1-3) shall be controlled by the use of conventional inks (42% or less VOC by weight), UV inks, water based coatings (10% or less VOC by weight), and isopropyl alcohol fountain solution at 10% or less VOC by weight. A change in inks, coatings, or fountain solution may require a permit to modify and operate. The printing presses shall be provided with adequate access for inspection.

   (9 VAC 5-80-110, and Condition 9 of NSR dated 07/10/2007)

2. The throughput of conventional offset inks for the three sheetfed offset lithographic presses (LP 1-3) shall not exceed 1474.2 tons per year, calculated monthly as the sum of each consecutive twelve (12) month period.

   (9 VAC 5-80-110, and Condition 14 of NSR dated 07/10/2007)

3. The throughput of conventional washers and cleaners for the three sheetfed offset lithographic presses (LP 1-3) shall not exceed 30.9 tons per year, calculated monthly as the sum of each consecutive 12-month period.

   (9 VAC 5-80-110, and Condition 15 of NSR dated 07/10/2007)

4. The throughput of UV washes for two sheetfed offset lithographic presses (LP-1 and LP-3), shall not exceed 19.5 tons per year, calculated monthly as the sum of each consecutive 12-month period.

   (9 VAC 5-80-110, and Condition 16 of NSR dated 07/10/2007)

5. The throughput of isopropyl alcohol added to the fountain solution for the three sheetfed offset lithographic presses (LP 1-3) shall not exceed 50.5 tons per year, calculated monthly as the sum of each consecutive 12-month period.

   (9 VAC 5-80-110, and Condition 17 of NSR dated 07/10/2007)

6. The throughput of water based coatings for the three sheetfed offset lithographic presses (LP 1-3) shall not exceed 1305.7 tons per year, calculated monthly as the sum of each consecutive 12-month period.

   (9 VAC 5-80-110, and Condition 18 of NSR dated 07/10/2007)

7. The products listed in Conditions III.A 2 through 6 can be used along with UV inks in any combination during the year such that emissions from the operation of the three sheetfed offset lithographic presses (LP 1-3) shall not exceed the limits specified below:

Volatile Organic Compounds	114.6 ton/yr

   (9 VAC 5-80-110, and Condition 21 of NSR dated 07/10/2007)

8. At all times the disposal of volatile organic compounds shall be accomplished by taking measures, to the extent practicable, consistent with air pollution control practices for minimizing emissions. Volatile organic compounds shall not be intentionally spilled, discarded in sewers which are not connected to a treatment plant, or stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution practices for minimizing emissions.
(9 VAC 5-80-110, 9 VAC 5-80-10 H, and Condition 10 of NSR dated 07/10/2007)

B. Monitoring

1. From a material balance of all products used by the three lithographic presses (LP 1-3) and Material Safety Data Sheets (MSDS) for the products, the permittee shall calculate the monthly and annual throughput of VOC emissions, except as required by Condition III.B.2 to demonstrate compliance with Condition III.A.7. If VOC contents are given as a range, the maximum value shall be used. The annual emissions are the sum of each consecutive 12-month period.
(9 VAC 5-80-110)

2. If any monthly monitoring (as required in Condition III.B.1) indicates that VOC emissions are equal to or greater than 50% of the allowable limit in Condition III.A.7, the VOC content of each VOC material used shall be determined the next calendar quarter using Reference Method 24 or 24A (40 CFR 60, Appendix A) and such determined VOC content shall be used for the purpose of calculating throughput and emissions. VOC content testing shall be conducted by the permittee or the supplier may provide a manufacturer's certificate of VOC content of the batch as supplied for each formulation of material received after such emissions threshold has been achieved. Each VOC material shipment received shall be clearly identified by a product formulation number which may be correlated to Method 24 or 24A test results. The most recent test results of VOC content for each formulation shall be used in the emission calculations. Quarterly testing may be discontinued after actual coating VOC emissions are below 50% of the allowable limit in Condition III.A.7 for three consecutive months. If quarterly testing is discontinued, the VOC content determined in the latest test or manufacturer's certificate for each formulation may be used in lieu of the MSDS value in throughput and emission calculations.
(9 VAC 5-80-110)

C. Recordkeeping

1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. These records shall include, but are not limited to:
   a. The yearly throughput (in tons) of the following materials for the Litho Center:
      (1) Conventional offset inks;

(2) press/roller/blanket washes;

(3) UV washes;

(4) isopropyl alcohol;

(5) water based coatings; and

(6) yearly is calculated monthly as the sum of each consecutive 12-month period;

b. Material Safety Data Sheets for materials used by the gravure and litho presses that display the VOC by weight for all the materials used in the presses; and

c. Yearly VOC emissions shall be calculated monthly for the conventional inks, press/roller/blanket wash, UV wash, isopropyl alcohol, and water based (acrylic) coatings used by the three litho presses (LP 1-3), calculated monthly as the sum of each consecutive 12-month period to show compliance with Condition III.A.7.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110 and Condition 24 of NSR permit dated 07/10/2007)

D. Testing

1. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ.

   (9 VAC 5-80-110)

IV. Facility Wide Conditions, NSR permit of 7/10/2007

A. Monitoring and Recordkeeping

1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. These records shall include, but are not limited to:
   a. Requests by DEQ to reduce level of operations or shut down the facility to avoid violating any primary ambient air quality standard and the permittee's actions.
   b. Notifications of the permittee's intention to shut down or bypass, or both, air pollution control equipment for necessary scheduled maintenance, which results in excess emissions for more than one hour.

   These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

   (9 VAC 5-80-110)

B. Reporting

a. The permittee shall furnish notification to the Director, Tidewater Regional Office of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone or telegraph. Such notification shall be made as soon as practicable but no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within two weeks of discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the Director, Tidewater Regional Office.

b. (9 VAC 5-80-110, 9 VAC 5-20-180 C , and Condition 29 of NSR permit dated 07/10/07)

V. Production Center/Technical Center – (RGP-1, RGP-3, and RGP-4), SCENARIO #1 for MACT--Subpart A and KK

A. Limitations

1. The three rotogravure presses (RGP-1, RGP-3, and RGP-4) shall apply no more than 400 kg (881.8 lbs) per month of organic hazardous air pollutants (HAP).
   (9 VAC 5-80-110 and 40 CFR 63, Subpart KK, § 63.821(b) ,§ 63.821(b)(2), and Condition 35 of NSR permit dated 07/10/2007)

2. If the three rotogravure presses (RGP-1, RGP-3, and RGP-4) apply more than 400 kg (881.8 lbs) of organic HAP for any month, then scenario # 2 for MACT Subpart A and KK must be used for that month and all following months. Once the permittee has gone to scenario # 2 for MACT Subpart A and KK, it can not return to scenario # 1 for MACT Subpart A and KK even if the monthly applied organic HAP is equal to or less than 400 kg (881.8 lbs).
   (9 VAC 5-80-110, 40 CFR 63, Subpart KK, § 63.821(c), and Condition 36 of NSR permit dated 07/10/2007)

B. Monitoring/Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Region. These records shall include, but are not limited to:

1. Monthly total volume and organic HAP content of each material applied by the three rotogravure presses (RGP-1, RGP-3, and RGP-4).

2. The monthly total organic HAP applied by the three rotogravure presses (RGP-1, RGP-3, and RGP-4) to demonstrate compliance with Condition V.A.1.

3. The records of initial notification to DEQ and EPA, Region III of affected source for existing source start-up prior to compliance date of 40 CFR 63, Subpart KK.

These records shall be kept at the facility, made available for inspection by DEQ, and shall be current for the most recent five years.

(9 VAC 5-80-110 and 40 CFR 63, Subpart KK, § 63.821(b), § 63.829(e), § 63.829(e)(2), and § 63.830(b)(1)(i, iii, & iv), 40 CFR 63, Subpart A, § 63.9(b), and Condition 37 of NSR permit dated 07/10/2007)

C. Testing

1. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ as follows:

   (9 VAC 5-80-110)

D. Reporting

1. The permittee shall submit, upon request by the DEQ, the records required by Condition V.B.1 & 2 to Director, Tidewater Region.
(9 VAC 5-80-110 F and 40 CFR 63, Subpart KK, § 63.821(b), § 63.829(e), and Condition 39 of NSR permit dated 07/10/2007)

VI. Production Center/Technical Center – (RGP-1, RGP-3, and RGP-4), SCENARIO #2 for MACT--Subpart A and KK

A. Limitations

1. The HAP emissions for the three rotogravure presses (RGP-1, RGP-3, and RGP-4) shall not be more than five percent of the organic HAP applied for the month. This shall be accomplished by operating capture and control devices for the three rotogravure presses (RGP-1 and RGP-3) in the Production Center that shall have an overall control efficiency of at least 95% for organic HAP for each month and by operating capture and control devices for the one rotogravure press (RGP 4) in the Technical Center that shall have an overall control efficiency of at least 95% for organic HAP for each month.
(9 VAC 5-80-110, 40 CFR 63, Subpart KK, § 68.825(b), § 68.825(b)(7)), § 68.825(h), § 68.825(h)(3), and Condition 40 of NSR permit dated 07/10/2007)

2. The total permanent enclosures used in the Production Center and Technical Center to control presses RGP-1, RGP-3, and RGP-4 shall meet the following criteria:
   a. Any natural draft openings shall be at least 4 equivalent opening diameters from each VOC emitting point;
   b. The total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
   c. The average facial velocity of air through the natural draft openings shall be at least 200 feet per minute and the direction of flow shall be into the enclosure.
   (9 VAC 5-80-110, 40 CFR 63, Subpart KK, § 68.825(h)(3), and Condition 41 of NSR permit dated 07/10/2007)

3. Each chamber of the catalytic incinerator (CI-1) for the Production Center shall maintain a minimum inlet temperature of 550 ºF and a retention time of 0.34 seconds. The catalytic incinerator shall be equipped with devices to continuously measure temperature before and after the catalyst bed and the pressure drop across the catalyst bed. The maximum outlet temperature from the catalyst bed shall not exceed 1200 ºF. The permittee shall maintain records of the manufacturer's recommendations for catalyst bed replacement and records of actual catalyst bed replacement.
(9 VAC 5-80-110, 40 CFR 63, Subpart KK, § 68.825(b), 40 CFR 63, Subpart KK, § 68.825(h), and Condition 42 of NSR permit dated 07/10/2007)

4. The catalytic incinerator (CI-2) for the Technical Center shall maintain a minimum inlet temperature of 550 ºF and a retention time of 0.20 seconds. The catalytic incinerator shall be equipped with devices to continuously measure temperature before and after the catalyst bed and the pressure drop across the catalyst bed. The maximum outlet temperature from the catalyst bed shall not exceed 1200 ºF. The permittee shall maintain records of the manufacturer's recommendations for catalyst bed replacement and records of actual catalyst bed replacement.
(9 VAC 5-80-110, 40 CFR 63, Subpart KK, § 68.825(h)(3), and Condition 43 of NSR permit dated 07/10/2007)

5. At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain the rotogravure presses (RGP-1, RGP-3, AND RGP-4), including associated air pollution control equipment and continuous monitoring system (CMS), in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards.
(9 VAC 5-80-110, 40 CFR 63, Subpart A, § 63.6(e)(1)(i), 63.6(e)(3)(ii) and § 63.8 (c)(1), and Condition 44 of NSR permit dated 07/10/2007)

6. Malfunctions of the catalytic incinerator shall be corrected as soon as practicable after their occurrence in accordance with the start-up, shutdown, and malfunction plan required in Condition VI.B.2.
(9 VAC 5-80-110, 40 CFR 63, Subpart A, § 63.6(e)(1)(ii) and § 63.8 (c)(1)(i), and Condition 45 of NSR permit dated 07/10/2007)

7. Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.
(9 VAC 5-80-110, 40 CFR 63, Subpart KK, § 68.6(e)(1)(iii), and Condition 46 of NSR permit dated 07/10/2007)

8. The permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining and a program of corrective action for the rotogravure presses (RGP-1, RGP-3, and RGP-4), including associated air pollution control equipment used to comply with the relevant standard and continuous monitoring system (CMS), during periods of startup, shutdown, and malfunction. The plan shall include the identification of all routine or otherwise predictable process, air pollution control and CMS equipment malfunctions. The purpose of the startup, shutdown, and malfunction plan is to:
   a. Ensure that, at all times, the permittee operates and maintains the rotogravure presses (RGP-1, RGP-3, and RGP-4), including associated air pollution control equipment and CMS, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards;
   b. Ensure that the permittee is prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of hazardous air pollutants. This includes keeping the necessary parts readily available for repairs identified for predictable malfunctions of process, air pollution control, and CMS equipment.

c. Reduce the reporting burden associated with periods of startup, shut-down, and malfunction (including corrective action taken to restore malfunctioning process, associated air pollution control, and CMS equipment to its normal or usual manner of operation).

d. To satisfy the requirements of this permit to develop a startup, shutdown, and malfunction plan, the owner or operator may use the rotogravure presses (RGP-1, RGP-3, and RGP-4), the associated air pollution control equipment, and continuous monitoring system (CMS), standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) or other plan, provided the alternative plans meet all the requirements of the requirements listed above.

e. (9 VAC 5-80-110, 40 CFR 63, Subpart A, § 63.6(e)(3)(i), § 63.6(e)(3)(vi), § 63.8 (c)(1)(i), § 63.8(d)(2)(vi), and Condition 47 of NSR permit dated 07/10/2007)

9. The permittee shall not fail to provide notifications, reports, or revisions of such as required in Condition VI.E.
(9 VAC 5-80-110, 40 CFR 63, Subpart A, § 63.4(a)(ii), and Condition 48 of NSR permit dated 07/10/2007)

B. Monitoring

1. Monitoring shall be conducted as set forth in this section unless the DEQ specifies or approves the use of minor changes in methodology for the specified monitoring requirements and procedures.
(9 VAC 5-80-110, 40 CFR 63, Subpart A, § 63.8(b)(1) and(b)(1)(i), and Condition 49 of NSR permit dated 07/10/2007)

2. Catalytic incinerator for Production Center: The permittee shall install, calibrate, operate, and maintain each chamber of the catalytic incinerator (CI-1) with a temperature continuous monitoring system (CMS) to measure and record the inlet and outlet temperature to and from the catalyst bed. The temperature device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times RGP-1 or RGP 3 is operating.

   a. Any 3-hour average inlet temperature below 550 ºF shall be noted as an excursion. Any 3-hour average outlet temperature above 1200 ºF shall be noted as an excursion. All noted excursions shall require immediate maintenance on the catalytic incinerator to return the inlet and/or out temperature to within its normal range of readings. All 3-hour average temperature excursions shall be considered a permit violation of Condition VI.A.1.

   b. The temperature CMS shall be capable of monitoring temperature with an accuracy of ±1 percent of the temperature being monitored in °C or ±1 °C, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet and outlet to obtain a representative temperature value.

c. The temperature CMS shall be installed, calibrated, maintained, and operated according to manufacturers' specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced. The replacement shall be done either if the owner or operator chooses not to perform the calibration, or if the equipment cannot be calibrated properly.

d. The permittee shall develop and implement a quality control program for the temperature CMS. Each quality control program shall include, at a minimum, a written protocol that describes procedures for each of the following operations:

(1) Initial and any subsequent calibration of the CMS;

(2) Preventive maintenance of the CMS, including spare parts inventory;

(3) Data recording, calculations, and reporting;

(4) Accuracy audit procedures, including sampling and analysis methods;

e. All temperature CMS equipment shall be installed, operational, and the data verified. Verification of operational status shall, at a minimum, include completion of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system

(9 VAC 5-80-110, 40 CFR 63, Subpart KK, § 63.825(d)(1), § 63.825(d)(1)(x), §63.828(a)(4), §63.828(a)(2)(ii), §63.828(b), Subpart A, § 63.8(c)(2)) and(c)(3), § 63.8(d)(2), and Condition 50 of NSR permit dated 07/10/2007)

3. Catalytic incinerator for Technical Center: The permittee shall install, calibrate, operate, and maintain the catalytic incinerator (CI-2) with a temperature continuous monitoring system (CMS) to measure and record the inlet and outlet temperature to and from the catalyst bed. The temperature device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times RGP-4 is operating.

a. Any 3-hour average inlet temperature below 550 ºF shall be noted as an excursion. Any 3-hour average outlet temperature above 1200 ºF shall be noted as an excursion. All noted excursions shall require immediate maintenance on the catalytic incinerator to return the inlet and/or out temperature to within its normal range of readings. All 3-hour average temperature excursions shall be considered a permit violation of Condition VI.A.1.

b. The temperature CMS shall be capable of monitoring temperature with an accuracy of ±1 percent of the temperature being monitored in °C or ±1 °C, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet and outlet to obtain a representative temperature value.

c. The temperature CMS shall be installed, calibrated, maintained, and operated according to manufacturers' specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced. The replacement shall be done either if the owner or operator chooses not to perform the calibration, or if the equipment cannot be calibrated properly.

d. The permittee shall develop and implement a quality control program for the temperature CMS. Each quality control program shall include, at a minimum, a written protocol that describes procedures for each of the following operations:

(1) Initial and any subsequent calibration of the CMS;

(2) Preventive maintenance of the CMS, including spare parts inventory;

(3) Data recording, calculations, and reporting;

(4) Accuracy audit procedures, including sampling and analysis methods.

e. All temperature CMS equipment shall be installed, operational, and the data verified prior to or in conjunction with conducting performance tests under Condition No VI.D.2. Verification of operational status shall, at a minimum, include completion of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system.

(9 VAC 5-80-110, 40 CFR 63, Subpart KK, § 63.825(d)(1), § 63.825(d)(1)(x), §63.828(a)(4), §63.828(a)(2)(ii), §63.828(b), and Subpart A, § 63.8(c)(2) and 63.8(c)(3), § 63.8(d)(2), and Condition 51 of NSR permit dated 07/10/2007)

4. The permittee shall develop and submit to the DEQ a monitoring plan for each permanent total enclosure (PTE) for RGP-1, RGP-3, and RGP-4 within 45 days of this scenario becoming effective. The permittee shall begin to conduct monitoring according to the PTE monitoring plan upon submittal to DEQ. DEQ may request changes to the plan upon review. Any excursions from the values set in the monitoring plan shall be considered a permit violation of Condition VI.A.1. The plan shall:

a. Identify the operating parameter(s) and the range of values to be monitored to ensure that the PTE certified during the initial compliance performance test is maintained,

b. Discuss why this parameter(s) is/are appropriate for demonstrating ongoing compliance, and

c. Identify the specific monitoring procedures.

(9 VAC 5-80-110, 40 CFR 63, Subpart KK, § 63.825(d)(1), § 63.825(d)(1)(x), §63.828(a)(5), §63.828(a)(5)(i-iii), §63.828(b), and Condition 52 of NSR permit dated 07/10/2007)

C. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters as necessary to demonstrate compliance with this permit and as required by 40 CFR 60, Subpart A and KK. The content and format of such records shall be arranged with the Director, Tidewater Region. These records shall include, but are not limited to:

1. If an action taken by the permittee during a startup, shutdown, or malfunction (including an action taken to correct a malfunction) is not consistent with the procedures specified in the permittee's startup, shutdown, and malfunction plan, the permittee shall record the actions taken for that event.
   (9 VAC 5-80-110, 40 CFR 63, Subpart KK, § 63.829(b) and § 63.829(b)(1), and 40 CFR 63, Subpart A, § 63.6(e)(iv)), § 63.10(b)(2)(iv),and Condition 53 of NSR permit dated 07/10/2007)

2. The permittee shall keep the written startup, shutdown, and malfunction plan on record after it is developed to be made available for inspection, upon request, by the DEQ for the life of the affected source or until the affected source is no longer subject to the provisions of this part. In addition, if the startup, shutdown, and malfunction plan is revised, the permittee shall keep previous (i.e., superseded) versions of the startup, shutdown, and malfunction plan on record, to be made available for inspection, upon request, by the DEQ for a period of 5 years after each revision to the plan.
   (9 VAC 5-80-110, 40 CFR 63, Subpart A, § 63.6(e)(v), and Condition 53 of NSR permit dated 07/10/2007)

3. For a minimum of 5 years after a performance test is conducted on the RGP-1, RGP-3, and RGP-4 and associated air pollution control equipment and performance, the permittee shall retain and make available, upon request, for inspection by the DEQ the records or results of such performance test and other data needed to determine emissions from the RGP-1, RGP-3, and RGP-4.
   (9 VAC 5-80-110, 40 CFR 63, Subpart A, § 63.7(g)(3), § 63.10(b)(2)(viii), and Condition 53 of NSR permit dated 07/10/2007)

4. The permittee shall maintain relevant records for RGP-1, RGP-3, and RGP-4, associated air pollution equipment, and temperature CMSs of:
   a. The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);
   b. The occurrence and duration of each malfunction of the air pollution control equipment;
   c. All maintenance performed on the air pollution control equipment;

d. All information necessary to demonstrate conformance with the permittee's startup, shutdown, and malfunction plan when all actions taken during periods of start-up, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. (The information needed to demonstrate conformance with the startup, shutdown, and malfunction plan may be recorded using a ''check-list,'' or some other effective form of recordkeeping, in order to minimize the recordkeeping burden for conforming events);

e. Each period during which a temperature CMS is malfunctioning or inoperative;

f. All required measurements needed to demonstrate compliance with the permit limitations (including, but not limited to, 3-hr averages of temperature CMS data, raw performance testing measurements, and raw performance evaluation measurements, that support data that the source is required to report);

g. All results of temperature CMS performance evaluations;

h. All measurements as may be necessary to determine the conditions of performance tests and performance evaluations;

i. All temperature CMS calibration checks; and

j. All adjustments and maintenance performed on temperature CMS.

(9 VAC 5-80-110, 40 CFR, Subpart KK, § 63.829(b) and § 63.829(b)(1), 40 CFR 63, Subpart A, § 63.6(e)(3)(iii), § 63.10(b)(2)(i-iii), § 63.10(b)(2)(v-xi)), and Condition 53 of NSR permit dated 07/10/2007)

5. Additional recordkeeping requirements for the permittee for each temperature CMS:

a. All required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns);

b. The date and time identifying each period during which the CMS were inoperative;

c. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and temperature parameter monitoring exceedances, as defined in the permit, that occurs during startups, shutdowns, and malfunctions of the CMS;

d. The nature and cause of any malfunction (if known);

e. The corrective action taken or preventive measures adopted;

f. The nature of the repairs or adjustments to the CMS that was inoperative ;

g. The total process operating time during the reporting period; and

h. All procedures that are part of a quality control program developed and implemented for CMS.

i. In order to satisfy the requirements of Conditions VI.C.5.d-f and to avoid duplicative recordkeeping efforts, the permittee may use the startup, shutdown, and malfunction plan or records kept to satisfy the recordkeeping requirements of the startup, shutdown, and malfunction plan**,** provided that such plan and records adequately address the requirements of Conditions VI.C.5.d-f.

(9 VAC 5-80-110, 40 CFR, Subpart KK, § 63.829(b) and § 63.829(b)(3), 40 CFR 63, Subpart A, § 63.10(c)(1) and § 63.10(c)(7-15), and Condition 54 of NSR permit dated 07/10/2007)

6. The permittee shall keep the written CMS quality control procedures and CMS performance evaluation test plan on record for the life of the affected source or until the affected source is no longer subject to the provisions of this part, to be made available for inspection, upon request, by the DEQ. If the performance evaluation plan is revised, the owner or operator shall keep previous (i.e., superseded) versions of the performance evaluation plan on record to be made available for inspection, upon request, by the DEQ, for a period of 5 years after each revision to the plan.
(9 VAC 5-80-110, 40 CFR 63, Subpart A, § 63.8(d)(3), and Condition 55 of NSR permit dated 07/10/2007)

7. The permittee shall keep the permanent total enclosure monitoring plan and monitoring results.
(9 VAC 5-80-110, 40 CFR 63, Subpart KK, § 63.828(a)(5) and (a)(5)(i-iii), and Condition 56 of NSR permit dated 07/10/2007)

8. The permittee shall maintain files of all information (including all reports and notifications required by this permit) recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained at the facility. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.
(9 VAC 5-80-110, 40 CFR 63, Subpart A, § 63.10(b)(1), and Condition 57 of NSR permit dated 07/10/2007)

D. Testing

1. The permittee shall conduct a performance evaluation for each catalytic incinerator temperature CMS during any required performance test when operating under Scenario #2.
   a. Before conducting a required CMS performance evaluation, the permittee shall develop a site-specific performance evaluation test plan for DEQ approval. The performance evaluation test plan shall include the evaluation program objectives, an evaluation program summary, the performance evaluation schedule, data quality objectives, and both an internal and external QA program. Data quality objectives are the pre-evaluation expectations of precision, accuracy, and completeness of data.

b. The CMS internal QA program shall include, at a minimum, the activities planned by routine operators and analysts to provide an assessment of CMS performance. The external QA program shall include, at a minimum, systems audits that include the opportunity for on-site evaluation by the DEQ of instrument calibration, data validation, sample logging, and documentation of quality control data and field maintenance activities.

c. In the event that the DEQ fails to approve or disapprove the site-specific CMS performance evaluation test plan within 30 days from receipt the following conditions shall apply:

If the permittee intends to demonstrate compliance using the monitoring method(s) specified in the test plan, the permittee shall conduct the performance evaluation within the time specified in the test plan using the specified methods.

(9 VAC 5-80-110, 40 CFR 63, Subpart KK § 63.8(e)(3)(i-ii), 40 CFR 63, Subpart A § 63.8(d)(2), § 63.8(e)(4), § 63.8(e)(3)(v), and (3)(v)(A), and Condition 59 of NSR permit dated 07/10/2007)

2. An initial performance test for RGP 1, 3, and 4 and the associated air pollution control equipment shall be conducted within 180 days after beginning operations under Scenario #2 to demonstrate the overall organic HAP control efficiency (R) is in compliance with Condition no. VI.A.1. The overall organic HAP control efficiency, (R), is calculated using: R = E x F. E = capture efficiency; F = destruction efficiency.
(9 VAC 5-60-100, 40 CFR, Subpart KK, § 63.825(d), § 63.825(d)(1), and § 63.825(d)(iii), and 40 CFR 63, Subpart A, § 63.7(a)(2))

a. Initial performance test to establish each catalytic incinerator destruction efficiency and associated catalytic bed inlet/outlet temperature shall be conducted and data reduced in accordance with the following procedure:

i. Method 1 or 1A of 40 CFR Part 60, Appendix A is used for sample and velocity traverses to determine sampling locations.

ii. Method 2, 2A, 2C, or 2D of 40 CFR Part 60, Appendix A is used to determine gas volumetric flow rate.

iii. Method 3 of 40 CFR Part 60, Appendix A is used for gas analysis to determine dry molecular weight.

iv. Method 4 of 40 CFR Part 60, Appendix A is used to determine stack gas moisture.

v. Methods 2, 2A, 3, and 4 of 40 CFR Part 60, Appendix A shall be performed, as applicable, at least twice during each test period.

vi. Method 25 of 40 CFR Part 60, Appendix A, shall be used to determine organic volatile matter concentration, except as provided in Condition No. VI.D.2.a.(vi)(a-c). The permittee may use Method 25A of 40 CFR Part 60, Appendix A, if:

(a) An exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required to comply with the limits of Condition no. VI.A.1, or

(b) The organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less, or

(c) Because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

vii. Each performance test shall consist of three separate runs; each run conducted for at least one hour under the conditions that exist when the RGP 1, 3, and 4 are operating under normal operating conditions. For the purpose of determining organic volatile matter concentrations and mass flow rates, the average of results of all runs shall apply. Upon receiving approval from the DEQ, results of a test run may be replaced with results of an additional test run in the event that:

(a) A sample is accidentally lost after the testing team leaves the site; or

(b) Conditions occur in which one of the three runs must be discontinued because of forced shutdown; or

(c) Extreme meteorological conditions occur; or

(d) Other circumstances occur that are beyond the permittee's control.

b. The owner or operator shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

c. For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. For the catalytic incinerator in the Production Center, the permittee shall establish as close as possible the operating temperature of 550 ^{o}F for the minimum gas temperature up-stream of the catalyst bed. For the catalytic incinerator in the Technical Center, the permittee shall establish as close as possible the operating temperature of 550 ^{o}F for the minimum gas temperature up-stream of the catalyst bed. These minimum temperatures are the operating values that demonstrate continuing compliance with the requirements of Condition no. VI.A.1.

d. Before conducting a required performance test, the permittee shall develop a site-specific test plan. The test plan shall include a test program summary, the test schedule, data quality objectives, and both an internal and external quality assurance (QA) program. Data quality objectives are the pretest expectations of precision, accuracy, and completeness of data.

(i) The internal QA program shall include, at a minimum, the activities planned by routine operators and analysts to provide an assessment of test data precision; an example of internal QA is the sampling and analysis of replicate samples.

(ii) The external QA program shall include, at a minimum, application of plans for a test method performance audit (PA) during the performance test. The PA's consist of blind audit samples provided by the DEQ and analyzed during the performance test in order to provide a measure of test data bias. The external

QA program may also include systems audits that include the opportunity for on-site evaluation by the DEQ of instrument calibration, data validation, sample logging, and documentation of quality control data and field maintenance activities.

(iii) In the event that the DEQ fails to approve or disapprove the site-specific test plan within the 30 days from receipt, the following condition shall apply:

If the permittee intends to demonstrate compliance using the test method(s) specified in the relevant test plan, the permittee shall conduct the performance test within the time specified in Condition No. VI.D.2 using the specified method(s).

e. The owner or operator shall analyze performance audit (PA) samples during each performance test. If the DEQ fails to provide the required PA materials to the permittee in time to analyze the PA samples during a performance test, the requirement to conduct a PA under this paragraph shall be waived for that performance test. Waiver under this paragraph of the requirement to conduct a PA for a particular performance test does not constitute a waiver of the requirement to conduct a PA for future required performance tests.

f. Performance testing of facilities - For each required performance testing, the permittee shall provide performance testing facilities as follows:

i. Sampling ports adequate for test methods applicable to such source. This includes:

a. Constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and procedures; and

b. Providing a stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures;

ii. Safe sampling platform(s);

iii. Safe access to sampling platform(s);

iv. Utilities for sampling and testing equipment; and

v. Any other facilities that the DEQ deems necessary for safe and adequate testing of a source.

g. Performance tests shall be conducted under such conditions as the DEQ specifies to the owner or operator based on representative performance (i.e., performance based on normal operating conditions) of the RGP 1, 3, and 4. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test, nor shall emissions in excess of the levels stated in Condition no. VI.A.1 during periods of startup, shutdown, and malfunction be considered a violation of the permit limits unless otherwise stated in the permit or a determination of noncompliance is made under Condition No. VI.A.5. Upon request, the permittee shall make available to the DEQ such records as may be necessary to determine the conditions of performance tests.

h. Performance tests shall be conducted and data shall be reduced in accordance with the test methods and procedures set forth in this section and, if required, in applicable appendices of parts 40 CFR 51, 60, 61, and 63 unless the DEQ:

i. Specifies or approves, in specific cases, the use of a test method with minor changes in methodology; or

ii. Approves shorter sampling times and smaller sample volumes when necessitated by process variables or other factors.

i. A performance test shall be conducted to determine the capture efficiency (E) of each capture system venting organic emissions to a control device shall be conducted by the permittee along with the performance test:

i. For permanent total enclosures, capture efficiency shall be assumed as 100 percent. Method 204 for Verification of a Permanent or Temporary Total Enclosure shall be used to confirm that an enclosure meets the requirements for permanent total enclosure.

(9 VAC 5-60-100, 40 CFR 63, Subpart KK § 63.825(d), § 63.825(d)(1), § 63.827(d)(1)(i-iii), § 63.827(d)(1-3), § 63.827(e), § 63.827(e)(1), and 40 CFR 63, Subpart A, § 63.7(a)(2), § 63.7(a)(2)(iii), § 63.7(b)(2)(i), § 63.7(b)(2)(ii), § 63.7(b)(2)(iii), § 63.7(b)(3)(ii), § 63.7(c)(4)(i), § 63.7(c)(4)(iii), § 63.7(d)(1-5), § 63.7(e)(1), § 63.7(e)(2), § 63.7(e)(2)(i & ii), § 63.7(e)(3), § 63.7(e)(3)(i-iii), and condition 58 of NSR permit dated 07/10/2007)

2. Nothing in Condition VI.D.1 of this permit shall be construed to abrogate the DEQ's authority to require testing under section 114 of the Clean Air Act.
(9 VAC 5-80-110, 40 CFR 63, Subpart A § 63.7(e)(4), and Condition 60 of NSR permit dated 07/10/2007)

E. Reporting

1. Not withstanding time periods or postmark deadlines specified in this section for the submittal of information to the DEQ by permittee, or the review of such information by the DEQ, such time periods or deadlines may be changed by mutual agreement between the permittee and the DEQ. A permittee who wishes to request a change in a time period or postmark deadline for a particular requirement shall request the adjustment in writing as soon as practicable before the subject activity is required to take place. The permittee shall include in the request whatever information he or she considers useful to convince the DEQ that an adjustment is warranted.
(9 VAC 5-80-110 F, 40 CFR 63, Subpart A § 63.1(a)(12), § 63.9(i)(2), § 63.10(a)(5), and Condition 61 of NSR permit dated 07/10/2007)

2. Performance test and performance evaluation reporting/notifications:
   a. The permittee shall notify and submit the test plans to the DEQ in writing of the intention to conduct a performance test and CMS performance evaluation at least 60 calendar days before the tests are scheduled to begin to allow the DEQ to review and approve the site-specific test plans and to have an observer present during the tests. Observation of the performance tests by the DEQ is optional.
   (9 VAC 5-80-110 F, 40 CFR 63, Subpart KK § 63.830(b)(2), § 63.827(d)(1)(vi), Subpart A § 63.7(b)(1), § 63.7(b)(2)(iv),§ 63.8 (d)(2), § 63.8 (e)(2), § 63.8 (e)(3)(i & iii), § 63.9(e), § 63.9(g), and Condition 62 of NSR permit dated 07/10/2007)

   b. The permittee shall request from DEQ the performance audit materials for the performance test 45 days prior to the test date.
   (9 VAC 5-80-110 F, 40 CFR 63, Subpart A § 63.7(b)(4)(i), and Condition 62 of NSR permit dated 07/10/2007)

   c. In the event the permittee is unable to conduct the performance test on the date specified in the notification of this section, due to unforeseeable circumstances beyond his or her control, the permittee shall notify the DEQ within five days prior to the scheduled performance test date and specify the date when the performance test is rescheduled. This notification of delay in conducting the performance test shall not relieve the owner or operator of legal responsibility for compliance with any other applicable provisions of this permit or with any other applicable Federal, State, or local requirement, nor will it prevent the DEQ from implementing or enforcing this permit or taking any other action under the Clean Air Act.
   (9 VAC 5-80-110 F, 40 CFR 63, Subpart A § 63.7(b)(2), and Condition 62 of NSR permit dated 07/10/2007)

   d. Unless otherwise specified in the test method, or as otherwise approved by the DEQ in writing, results of the performance test shall include the analysis of samples, determination of emissions, and raw data. A performance test is ‘‘completed’’ when field sample collection is terminated. The permittee shall report the results of the performance test and CMS performance evaluation to the DEQ before the close of business on the 60th day following the completion of the performance test, unless as approved otherwise in writing by the DEQ. Along with the test results, the permittee shall submit the permanent total enclosure monitoring plan.
   (9 VAC 5-80-110 F 40 CFR 63, Subpart KK § 63.830(b)(3 &4), 40 CFR 63, Subpart A § 63.7(g)(1), § 63.8(e)(5)(i), § 63.9(h)(3), § 63.10(d)(2), § 63.10(e)(2)), § 63.828(a)(5), and Condition 63 of NSR permit dated 07/10/2007)

3. Startup, shutdown, and malfunction reporting:
   a. All failures/malfunctions reports of process equipment or air pollution control equipment that may cause excess emissions for more than one hour must follow the requirements of Condition X. F.
   (9 VAC 5-80-110 F, and Condition 64 of NSR permit dated 07/10/2007)

b. Normal startup, shutdown, and malfunction reports: If failures/malfunctions do not qualify for Condition X.F and all actions taken by the permittee during a startup, shutdown, or malfunction of the RGP-1, RGP-3, and RGP-4 (including actions taken to correct a malfunction) are consistent with the procedures specified in the permittee's startup, shutdown, and malfunction plan, the permittee shall state such information in a startup, shutdown, and malfunction report as part of the report outlined in Condition X.C. Reports shall only be required if a startup, shutdown, or malfunction occurred during the reporting period. The startup, shutdown, and malfunction report shall consist of a letter, containing the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy. This separate report is not needed if all the required information is included in the Summary Report required by Condition VI.E.5.
(9 VAC 5-80-110 F, 40 CFR 63, Subpart KK § 63.830(b)(5)(i & ii), 40 CFR 63, Subpart A § 63.6(iii), § 63.8 (c)(1)(i), § 63.10(d)(5)(i), and Condition 64 of NSR permit dated 07/10/2007)

c. Immediate startup, shutdown, and malfunction reports: Any time an action taken by the permittee during a startup, shutdown, or malfunction not qualifying for Condition X.F (including actions taken to correct a malfunction) and is not consistent with the procedures specified in the permittee's startup, shut-down, and malfunction plan, the permittee shall report the actions taken for that event within two working days after commencing actions inconsistent with the plan followed by a letter within seven working days after the end of the event. The immediate report required under this paragraph shall consist of a telephone call (or facsimile (FAX) transmission) to the DEQ within two working days after commencing actions inconsistent with the plan, and shall be followed by a letter, delivered or postmarked within seven working days after the end of the event, that contains the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy, explaining the circumstances of the event, the reasons for not following the startup, shut-down, and malfunction plan, and whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred.
(9 VAC 5-80-110 F, 40 CFR 63, Subpart A § 63.6(e)(iv), § 63.10(d)(5)(ii), and Condition 64 of NSR permit dated 07/10/2007)

d. Immediate startup, shutdown, and malfunction reports: For those malfunctions or other events that affect the CMS and are not addressed by the startup, shutdown, and malfunction plan, the permittee shall report actions that are not consistent with the startup, shutdown, and malfunction plan within 24 hours (a telephone call or facsimile (FAX) transmission)) to the DEQ after commencing actions inconsistent with the plan. The permittee shall send a follow-up report within two weeks after commencing actions inconsistent with the plan that either certifies that corrections have been made or includes a corrective action plan and schedule. The owner or operator shall provide proof that repair parts have been ordered or any other records that would indicate that the delay in making repairs is beyond his or her control.
(9 VAC 5-80-110 F, 40 CFR 63, Subpart A § 63.8(c)(1)(ii), and Condition 64 of NSR permit dated 07/10/2007)

4. Full excess emissions and continuous monitoring system performance reports shall be submitted semi-annually with the report required by Condition X.C. This shall include:
   a. Name, title, and signature of the responsible official who is certifying the accuracy of the report;
   b. The date and time identifying each period during which the CMS was inoperative;
   c. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and temperature parameter monitoring exceedances, as defined in the permit, that occurs during startups, shutdowns, and malfunctions of the CMS;
   d. The specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the permit, that occurs during periods other than startups, shutdowns, and malfunctions of the CMS;
   e. The nature and cause of any malfunction (if known);
   f. The corrective action taken or preventive measures adopted;
   g. The nature of the repairs or adjustments to the CMS that was inoperative ;
   h. The total process operating time during the reporting period;
   i. When no excess emissions or exceedances of a parameter have occurred, or a CMS has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

   (9 VAC 5-80-110 F, 40 CFR 63, Subpart KK §63.830(b)(3), 40 CFR 63, Subpart A § 63.9(h)(3), § 63.10(e)(3)(i & v), and Condition 65 of NSR permit dated 07/10/2007)

5. Summary report: one summary report for the hazardous air pollutants monitored from RGP-1, RGP-3, and RGP-4 shall be submitted semi-annually with the report required by Condition X.C. The summary report shall be entitled, ‘‘Summary Report—Gaseous Excess Emission and Continuous Monitoring System Performance’’ and shall contain the following information:
   a. The company name and address of the permittee;
   b. An identification of each hazardous air pollutant monitored at the affected source;
   c. The beginning and ending dates of the reporting period;
   d. A brief description of the process units;
   e. The emission and temperature CMS operating parameter limitations specified in this permit and permanent total enclosure (PTE) operating parameter(s) limitations specified in the PTE monitoring plan;
   f. The CMS monitoring equipment manufacturer(s) and model number(s);
   g. The date of the latest CMS certification or audit;
   h. The total operating time of the affected source during the reporting period;

i. An emission data summary, including:

(1) The total duration of excess emissions during the reporting period (recorded in minutes hours for gases),

(2) The total duration of excess emissions expressed as a percent of the total source operating time during that reporting period,

(3) And a breakdown of the total duration of excess emissions during the reporting period into those that are due to startup/shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

j. A CMS performance summary including:

(1) The total CMS down-time during the reporting period (recorded hours for gases);

(2) The total duration of CMS downtime expressed as a percent of the total source operating time during that reporting period;

(3) And a break-down of the total CMS downtime during the reporting period into periods that are due to monitoring equipment malfunctions, non-monitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes.

k. A description of any changes in CMS, processes, or controls since the last reporting period;

l. The name, title, and signature of the responsible official who is certifying the accuracy of the report; and

m. The date of the report.

(9 VAC 5-80-110 F, 40 CFR 63, Subpart KK §63.830(b)(3), §63.830(b)(6), 40 CFR 63, Subpart A § 63.9(h)(3), § 63.10(e)(3)(i & vi), and Condition 66 of NSR permit dated 07/10/2007)

6. If the total duration of excess emissions for the reporting period is less than 1 percent of the total operating time for the reporting period, and CMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report shall be submitted, and the full excess emissions and continuous monitoring system performance report need not be submitted.

(9 VAC 5-80-110 F, 40 CFR 63, Subpart A § 63.10(e)(3)(vi), and Condition 67 of NSR permit dated 07/10/2007)

7. If the total duration of excess emissions exceedances for the reporting period is 1 percent or greater of the total operating time for the reporting period, or the total CMS downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, both the summary report and the full excess emissions and continuous monitoring system performance report shall be submitted.
(9 VAC 5-80-110 F, 40 CFR 63, Subpart A § 63.10(e)(3)(viii), and Condition 68 of NSR permit dated 07/10/2007)

8. Changes in information already provided to DEQ: Any change in the information already provided under this section shall be provided to the DEQ in writing within 15 calendar days after the change.
(9 VAC 5-80-110 F, 40 CFR 63, Subpart A § 63.9(j), and Condition 69 of NSR permit dated 07/10/2007)

9. The permittee shall submit to DEQ the monitoring plan for each permanent total enclosure (PTE) for RGP-1, RGP-3, and RGP-4 within 45 days of this scenario becoming effective.
(9 VAC 5-80-110 F, 40 CFR 63, Subpart KK, §63.828(a)(5), and Condition 70 of NSR permit dated 07/10/2007)

10. A copy of reports required by Condition Nos. VI.E.2, VI.E.3, VI.E.5, VI.E.6, VI.E.7, VI.E.8, and VI.E.9 shall be sent to:

    Chief, Air Enforcement Branch (3AP12), U.S. EPA, Region III

    ATTN: Subpart KK Coordinator

    1650 Arch Street

    Philadelphia, PA 19103-2029

    (9 VAC 5-80-110 F, 40 CFR 63, Subpart A, § 63.9(a)(ii)), 40 CFR 63, Subpart A § 63.9(b)(4), 40 CFR 63, Subpart A § 63.9(b)(4)(i & v), and Condition 71 of NSR permit dated 07/10/2007)

VII. Facility Wide, for MACT--Subpart A and KK

A. Monitoring/Recordkeeping

1. The permittee shall maintain files of all information (including all reports and notifications required by this permit) recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained at the facility. The remaining three years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.
   (9 VAC 5-80-110, 40 CFR 63, Subpart A, § 63.10(b)(1), and Condition 33 of NSR permit dated 07/10/2007)

B. Reporting

1. The permittee shall submit to the DEQ an application for approval of the reconstruction of a major affected source subject to 40 CFR 63, Subpart KK. The application shall be submitted as soon as practicable and well in advance of the reconstruction planned commencement date in order for the timely review and approval by the DEQ so that the planned commencement date will not be delayed. A separate application shall be submitted for each reconstruction. Each application for approval of reconstruction shall include at a minimum:
   a. The applicant's name and address;
   b. A notification of intention to make any physical or operational change to a major affected source that may meet or has been determined to meet the criteria for a reconstruction, as defined in 40 CFR 63, Subpart A, § 63.2;
   c. The address (i.e., physical location) or proposed address of the source;
   d. An identification of the relevant standard that is the basis of the application;
   e. The expected commencement date of the reconstruction;
   f. The expected completion date of reconstruction;
   g. The anticipated date of (initial) startup of the source;
   h. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times and in accordance with the test methods specified in the relevant standard, or if actual emissions data are not yet available, an estimate of the type and quantity of hazardous air pollutants expected to be emitted by the source reported in units and averaging times specified in the relevant standard. The owner or operator may submit percent reduction information if a relevant standard is established in terms of percent reduction. However, operating parameters, such as flow rate, shall be included in the submission to the extent that they demonstrate performance and compliance;

i. A brief description of the affected source and the components that are to be replaced;

j. A description of present and proposed emission control systems (i.e., equipment or methods). The description of the equipment to be used for the control of emissions shall include each control device for each hazardous air pollutant and the estimated control efficiency (percent) for each control device. The description of the method to be used for the control of emissions shall include an estimated control efficiency (percent) for that method. Such technical information shall include calculations of emission estimates in sufficient detail to permit assessment of the validity of the calculations;

k. An estimate of the fixed capital cost of the replacements and of constructing a comparable entirely new source;

l. The estimated life of the affected source after the replacements; and

m. A discussion of any economic or technical limitations the source may have in complying with relevant standards or other requirements after the proposed replacements. The discussion shall be sufficiently detailed to demonstrate to the DEQ satisfaction that the technical or economic limitations affect the source's ability to comply with the relevant standard and how they do so.

n. If in the application for approval of reconstruction the owner or operator designates the affected source as a reconstructed source and declares that there are no economic or technical limitations to prevent the source from complying with all relevant standards or other requirements, the permittee need not submit the information required in subparagraphs k-m of this section, above.

o. A notification of the actual date of startup of the source, delivered or postmarked within 15 calendar days after the date for reconstruction approved for an application submitted under this section.

p. A copy shall be sent to:

Chief, Air Enforcement Branch (3AP12), U.S. EPA, Region III
ATTN: Subpart KK Coordinator
1650 Arch Street
Philadelphia, PA 19103-2029

2. (9 VAC 5-80-110 F, 40 CFR 63, Subpart A, § 63.5(b)(4), § 63.5(d)(1)(i & ii), § 63.5(d)(3), § 63.5(d)(3)(i-vi), § 63.9(b)(4), § 63.9(b)(4)(i &v), § 63.9(b)(5), and Condition 34 of NSR permit dated 07/10/2007)

VIII. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C 2)
101	Gravure ink/coating storage room	9 VAC 5-80-720.A.57	VOC	
102	Litho Ctr solvent storage room	9 VAC 5-80-720.A.42	VOC	
103	Solvent storage tank farm, each tank less than 1000 gal	9 VAC 5-80-720.A.42	VOC	
105	Gravure Dept parts washer	9 VAC 5-80-720.A.38	VOC	
106	Gravure ink coloring & dispensing system	9 VAC 5-80-720.A.54	VOC	
107	Product quality control storage area (hot house)	9 VAC 5-80-720.A.46	VOC	
108	Cyclone paper baler system	9 VOC 5-80-720.B.1	PM	
	Maintenance Lubrication Distribution Center	9 VAC 5-80-720.C.3	VOC	

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

IX. Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
40 CFR 60, Subpart QQ	Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing	Publication Rotogravure Printing Presses
40 CFR 63, Subpart T	Halogenated Solvent Cleaners	Halogenated Solvent Cleaners

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.

(9 VAC 5-80-140)

X. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.

(9 VAC 5-80-110 N)

B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.

2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.

3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.

4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.

5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

C. Recordkeeping and Reporting

1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
   a. The date, place as defined in the permit, and time of sampling or measurements.
   b. The date(s) analyses were performed.
   c. The company or entity that performed the analyses.
   d. The analytical techniques or methods used.
   e. The results of such analyses.
   f. The operating conditions existing at the time of sampling or measurement.

   (9 VAC 5-80-110 F)

2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

   (9 VAC 5-80-110 F)

3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:
   a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
   b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:

      (1) Exceedance of emissions limitations or operational restrictions;

      (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or Compliance Assurance Monitoring (CAM) which indicates an exceedance of emission limitations or operational restrictions; or,

      (3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

   c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that “no deviations from permit requirements occurred during this semi-annual reporting period.”

   (9 VAC 5-80-110 F)

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

1. The time period included in the certification. The time period to be addressed is January 1 to December 31.

2. The identification of each term or condition of the permit that is the basis of the certification.

3. The compliance status.

4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.

5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.

6. Such other facts as the permit may require to determine the compliance status of the source.

7. One copy of the annual compliance certification shall be sent to EPA at the following address:

   Clean Air Act Title V Compliance Certification (3AP00)
   U.S. Environmental Protection Agency, Region III
   1650 Arch Street
   Philadelphia, PA 19103-2029

(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

The permittee shall notify the Director, Tidewater Regional Office within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition X.C.3 of this permit.

(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Tidewater Regional Office by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Tidewater Regional Office.

(9 VAC 5-20-180 C)

G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.

(9 VAC 5-80-110 G.1)

H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is ground for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.

(9 VAC 5-80-110 G.2)

I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(9 VAC 5-80-110 G.3)

J. Permit Modification

A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1605, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.

(9 VAC 5-80-190 and 9 VAC 5-80-260)

K. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege.

(9 VAC 5-80-110 G.5)

L. Duty to Submit Information

1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.

   (9 VAC 5-80-110 G.6)

2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.

   (9 VAC 5-80-110 K.1)

M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.

(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;

2. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;

3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or similar operations;

4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,

5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-40-90 and 9 VAC 5-50-90)

O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, and soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-50-20 E and 9 VAC 5-40-20 E)

P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.

(9 VAC 5-80-110 J)

Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.

2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.

3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.

4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

R. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

S. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9 VAC 5-80-150 E)

T. Transfer of Permits

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.

   (9 VAC 5-80-160)

2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.

   (9 VAC 5-80-160)

3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.

   (9 VAC 5-80-160)

U. Malfunction as an Affirmative Defense

1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.

2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:

   a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.

   b. The permitted facility was at the time being properly operated.

   c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.

   d. The permittee notified the Board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F.2.b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.

3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.

4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

(9 VAC 5-80-250)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any grounds for revocation or termination or for any other violations of these regulations.

(9 VAC 5-80-190 C and 9 VAC 5-80-260)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.

(9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.

(40 CFR Part 82, Subparts A-F)

Y. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.

(40 CFR Part 68)

Z. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(9 VAC 5-80-110 I)

AA. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.

2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.

3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)

XI. State-Only Enforceable Requirements

The following terms and conditions are not required under the federal Clean Air Act or under any of its applicable federal requirements, and are not subject to the requirements of 9 VAC 5-80-290 concerning review of proposed permits by EPA and draft permits by affected states.

1. Odor, 9 VAC 5-50-140

(9 VAC 5-80-110 N and 9 VAC 5-80-300)